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August 26, 2004

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EPA East (Mail Code 7407M)  
TSCA Section 8(e)  
Attn: Mr. Harry Lewis  
U.S. Environmental Protection Agency  
1201 Constitution Avenue, NW  
Washington, DC 20004

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**Subject:** Request for Review/Release of CBI claims on BASF Corporation TSCA 8 (e)  
Submissions on Industrial Chemicals



Dear Mr. Lewis,

This is in response to your request (E-mail dtd. 5/24/04) for review/release of CBI information claimed confidential by BASF Corporation on the TSCA 8 (e) submissions on industrial chemicals in order to complete the files.

BASF Corporation has gone through its 8 (e) files and has carefully screened all its 8 (e) submissions and definitively identified twelve submissions for industrial chemicals which have some CBI claims. CBI claims of the following nature were found in the submissions reviewed:

Company name, location, sales or importation volume, Chemical ID etc.

BASF released claims on eight of these submissions in letter dated 8/17/04. Out of the four remaining submissions BASF would like to continue confidentiality claims for three and release confidentiality claims on the fourth one. See attached (Attachment #1; Table 1.0) for the list of the remaining four submissions with EPA assigned reference numbers where available and the BASF position on the confidentiality claim:

- 1) [ ]
- 2) [ ]
- 3) 8EHQ-1003-15436A
- 4) 8EHQ-02-15204

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BASF Corporation  
3000 Continental Drive - North  
Mount Olive, N.J. 07828 -1234  
Tel: (800) 526-1072  
[www.basf.com/usa](http://www.basf.com/usa)

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BASF Corporation will keep the confidentiality claims on the three of the four submissions in Attachment 1; Table 1.0. Copies of the confidentiality substantiation claims are attached to complete the files.

Additionally, one previous submission on industrial chemical was identified with CBI claims (Table 2.0) however, this product has been sold. BASF Corporation is investigating their current obligation on this.

A confidential version is enclosed. If you have any questions or concerns please call me. Alternately, if you need any additional information please send me an e-mail at [Jastis@basf.com](mailto:Jastis@basf.com).

Sincerely,

A handwritten signature in cursive script that reads "Sree Jasti".

Sree L. Jasti, Ph.D.  
Product Regulatory Center of Excellence  
BASF Corporation  
1609 Biddle Ave  
Wyandotte, MI 48192

Enc.



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**Attachment # 1**

**Table 1.0**

<b>BASF Industrial Chemicals with CBI claims in the TSCA 8 (e) Submissions to EPA</b>				
<b>Chemical Name</b>	<b>CAS#</b>	<b>8EHQ #</b>	<b>Information Claimed Confidential</b>	<b>BASF Response on CBI</b>
[ Generic name : Nitrification inhibitor (Substituted pyrazole)	Not Available	Not available	Chemical ID claimed confidential on letter dtd. 5/21/98	BASF will continue to claim Chem ID confidential . CBI substantiation claim provided in 5/21/98 submission-Duplicate attached to complete file
[ ]	Not available	Not Available	Trade name claimed confidential on letter dtd. 9/8/99	BASF will continue claiming Trade name confidential – CBI substantiation provided in letter dtd. 9/8/99-Duplicate attached to complete file
Basazol Violet NMK	Not available	8EHQ-1003-15436A	Chem IDs claimed confidential in letter dtd. 12/30/2003	BASF will continue to claim Chem IDs confidential. CBI substantiation already submitted with 12/30/03 letter to EPA.-Duplicate attached to complete file
Glutaraldehyde		8EHQ-02-15204	Company name confidential	BASF releases claims on confidentiality on Company Name

**Table 2.0**

<b>BASF Industrial Chemical with CBI claims in the TSCA 8 (e) Submissions to EPA</b>				
<b>Chemical Name</b>	<b>CAS#</b>	<b>8EHQ #</b>	<b>Information Claimed Confidential</b>	<b>BASF Response on CBI</b>
[ ]		8EHQ-0790-1023 S	Trade name claimed confidential previously. No longer BASF product-Sold	Not a BASF substance currently to release any CBI information